

From: [Schulz, Natalie](#)
To: [Sirak, Reed](#); [W Michael Oberfield](#)
Cc: [Kuss, Hala](#); [Russell, Tess](#); [Demma, Carlo](#)
Subject: US EPA - Renergy Meeting 3/8
Date: Wednesday, March 9, 2022 2:38:28 PM

Hello,

Exemption 7(a)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Please provide the following, as discussed in our meeting:

1. Provide the owner's manual for the permanent monitor at the Emerald facility.
2. Provide start and end dates for engine and digester downtime, maintenance, rebuilds, reseeding, etc. at the Emerald and Dovetail facilities. Provide start and end dates for when all biogas was directed to the flare only at the Emerald and Dovetail facilities. *Provide answers in a clear, timeline format, starting in March 2017.*
3. Provide start and stop date(s) of receiving materials at the Emerald and Dovetail facilities, beginning in March 2017.
4. Account for the following gaps in hydrogen sulfide data: Emerald facility 6/29/2020 – 12/14/2020 and Dovetail facility 6/29/2020 – 10/04/2021.
5. Provide an explanation for the hydrogen sulfide level entries at the bottom of the spreadsheet titled "6 & 7 Hydrogen Sulfide Testing Log -WMO", specifically the entries starting at 5/9/22 for the Emerald facility and 10/18/2022 for the Dovetail facility.
6. Describe the origin and significance of the values "0.023 millions of cubic feet of biogas for the Engine" and "0.027 millions of cubic feet of biogas for the Flare" used in the volume MMSCF Usage calculation from the spreadsheets ("22 Emerald MMSCF" and "22 Dovetail MMSCF") submitted in response to item #22 of the initial 114 request.
7. Confirm and/or provide the following information: a. The capacity of the flares at the Emerald and Dovetail facilities is 440 scfm. b. Along with visual checks, Renergy is using AP-42 Chapter 13, Tables 15.1 -15.2 emission factors to ensure flare capacity is not being breached. If this is the case, provide an example of these calculations. c. Renergy is currently scheduling a stack test company to visit Emerald and Dovetail to determine, for each facility, the flare's exit velocities and maximum velocity. d. Explain how Renergy calculates the Net Heating Value according to 40 C.F.R. § 60.18.
8. Confirm the diameter of the flare tip at the Dovetail and Emerald facilities.

Please provide a response by Friday March 11, 2022.

Sincerely,

Natalie Schulz

Environmental Engineer

Air Enforcement and Compliance Assurance Branch

U.S. EPA, Region 5

schulz.natalie@epa.gov

Office: (312)886-2776